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January 28, 2021

Liane M. Randolph, Chair
California Air Resources Board
1001 I Street
Sacramento, CA 95814

RE: Drayage Truck Rule

Dear Chair Randolph,

The Harbor Association of Industry & Commerce (HAIC) is a non-profit industrial and commercial trade association that serves as a united voice on transportation, energy, environmental and land-use issues affecting the harbor business communities. In response to the California Air Resources Board (CARB) December 9 working group meeting on planned drayage truck rules, we have technical comments relating to the drayage truck operating characteristic data potentially being used.

We urge CARB to use the San Pedro Bay Ports **2019 Drayage Truck Feasibility (DTF)** report, not the **Calstart 2013**. The **Calstart 2013** study selectively focuses on short-haul drayage trucks and is not representative of all drayage truck types, while the **2019 Port Drayage Truck Feasibility (DTF)** report (finalized March 2019) should be relied upon because it has more recent data that includes surveys collected from over 3,300 trucks, and it addresses a full picture of drayage truck ranges and types.

California has some lofty climate goals and has been the leader in green technology. We appreciate CARB's efforts in the rulemaking process and ask the Board to consider these comments on drayage truck operating characteristics. Thank you for your attention on this matter, and we look forward to working with you to achieve a greener California.

Sincerely,

Henry Rogers
Executive Director
Harbor Association of Industry & Commerce

CC: Craig Duehring
Tony Brasil
Jessica Johnson